

EXHIBIT A

Justine Moore
1707 Elizabeth Street
Scranton, PA 18504

Plaintiff

v.

TrueAccord Corp.
16011 College Blvd., Suite 130
Lenexa, KS 66219

Defendant

MAURICE KELLY
LACKAWANNA COUNTY,

FILED - 5, A, 8, 16

Court of Common Pleas of Lackawanna
County - Civil Action

Case No.

21-CV-1506

Jury Trial Demanded

NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claim set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by an attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. **YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED RATE OR NO FEE.**

Northeastern Pennsylvania Legal Services
33 North Main Street, Suite 200
Pittston, PA 18640
Telephone (570) 299-4100

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Plaintiff

v.

Court of Common Pleas of Lackawanna
County – Civil Action

Case No. ____-CV-____

TrueAccord Corp.,

Defendant

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COMPLAINT

I. Introduction

1. This is an action for damages brought by an individual consumer for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* ("the Act") which prohibits debt collectors from engaging in abusive, unfair, and deceptive practices.

II. Jurisdiction

2. Jurisdiction of this Court is proper pursuant to 15 U.S.C. § 1692k(d), which permits an action under the Act to be brought in any court of competent jurisdiction.

3. Venue in this district is proper in that Defendant transacts business here and the conduct complained of is alleged to have occurred here.

III. Parties

4. Plaintiff, Justine Moore, is a natural person residing at 1707 Elizabeth Street, Scranton, PA 18504.

5. Defendant, TrueAccord Corp., ("TrueAccord") is a corporation with a place of business located at 16011 College Blvd., Suite 130, Lenexa, KS 66219.

6. TrueAccord uses the telephone in its business.

7. The principal purpose of TrueAccord's business is the collection of debts.

8. TrueAccord has reason to believe that a non-trivial portion of the accounts that it collects are for obligations for which the money, property, insurance or services which were the subjects of the transactions were primarily for personal, family, or household purposes.

9. TrueAccord has reason to believe that it is probably true that the principal purpose of its business is the collection of "debt" as that term is defined by 15 U.S.C. § 1692a(5).

10. The principal purpose of TrueAccord's business is the collection of "debt" as that term is defined by 15 U.S.C. § 1692a(5).

11. TrueAccord regularly attempts to collect debts asserted to be due to another. The term "debt" is used in this allegation as that term is defined by 15 U.S.C. § 1692a(5).

12. TrueAccord's website says, *inter alia*: "Debt collection is a financial service, and it needs to cater to consumers. We created TrueAccord to change the mindset around collections into that of recovery and reconciliation."
<https://www.trueaccord.com/about-us>. Last visited on March 24, 2021.

IV. Statement of Claim

13. Within the past year TrueAccord was attempting to collect an alleged account ("the Account") from Plaintiff.

14. The Account is a "debt" as that term is defined by the Act, 15 U.S.C.

§ 1692a(5).

15. While attempting to collect the Account, TrueAccord was acting as a "debt collector" defined by the Act, 15 U.S.C. § 1692a(6).

16. TrueAccord regularly uses the telephone to attempt to collect consumer debts alleged to be due another.

17. On February 18, 2021, TrueAccord caused at least one text message ("the Message") to be sent to Plaintiff's fiancé's cell phone, which ends in 0741.

18. This cell phone number has not been assigned to Plaintiff at any time.

19. Plaintiff has not provided this cell phone number to any creditor or debt collector.

20. The Message was an attempt to collect the Account.

21. Through the Message, TrueAccord disclosed to a third party—Plaintiff's fiancé—that Plaintiff owed a debt.

22. Defendant violated the Act, 15 U.S.C. § 1692c(b), which restricts communication with third parties.

WHEREFORE, Plaintiff demands judgment against Defendant for damages, costs, attorney's fees, and such other and further relief as the Court deems just and proper.

Respectfully Submitted,

Brett M. Freeman

Brett M. Freeman
Bar Number PA 308834
Attorney for Plaintiff
Sabatini Freeman, LLC
216 N. Blakely St.

Dunmore, PA 18512
Phone (570) 341-9000

Certification of Compliance

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Brett M.

Brett M. Freeman

Verification by Plaintiff Justine Moore

I affirm that the averments of fact contained in this pleading are true upon my personal knowledge or information and belief.

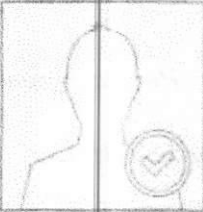

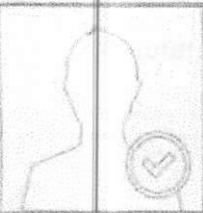

Justine Moore

Justine Moore

Signature Certificate

Document Ref.: HTABC-HE9Z8-KUASO-BXGVH

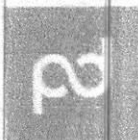
Document signed by:

	Brett Freeman Verified E-mail: brett@bankruptcypa.com	
107.77.241.50	26 Mar 2021 13:12:56 UTC	
	Justine Moore Verified E-mail: neenx45@gmail.com	
107.77.203.187	26 Mar 2021 13:41:39 UTC	

Document completed by all parties on:

26 Mar 2021 13:41:39 UTC

Page 1 of 1



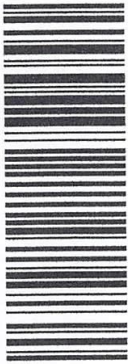
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Sabatini Freeman, LLC
216 N. Blakely Street
Dunmore, PA 18512

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TrueAccord Corp.
16011 College Blvd., Suite 130
Lenexa, KS 66219

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OF THE RETURN ADDRESS.

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>TrueAccord Corp. 16011 College Blvd., Suite 130 Lenexa, KS 66219</p>		<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>	
<p>2. Article Number (Transfer from service label)</p> <p>9590 9402 5561 9249 7891 71</p> <p>7020 2450 0002 3082 6096</p> <p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>		<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input type="checkbox"/> Adult Signature Restricted Mail</p> <p><input checked="" type="checkbox"/> Certified Mail</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Mail</p> <p><input type="checkbox"/> Collect on Delivery Restricted Mail Restricted Delivery</p> <p><input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p>Domestic Return Receipt</p>	